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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

2001 DEC 28 P 1:59

WILLIAM MUNDELL
Chairman

DOCKETED

JAMES M. IRVIN
Commissioner

DEC 28 2001

MARC SPITZER
Commissioner

AT CORP COMMISSION
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IN THE MATTER OF INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

DOCKET NO. T-00000D-00-0672

JOINT MOTION FOR EXTENSION
OF TIME

Qwest Corporation, AT&T Communications of the Mountain States, Inc., through their respective counsel, jointly move for a Commission order extending the time for an additional forty-five days from the current January 22, 2001, deadline in which to file written comments in response to the Procedural Order dated December 3, 2001. As grounds, the joint movants state as follows:

1. On December 20, 2001, the Commission granted the motion for extension of time filed by Citizens Communications Company, thereby extending the deadline for responses to the December 3, 2001, Procedural Order to January 22, 2002. For the reasons stated below, the joint movants respectfully move for an additional 45 days, up to and including March 8, 2002, in which to respond to the Procedural Order.

2. The December 3, 2001, Procedural Order contemplates a

1 historic change in the method and structure of intercarrier
2 compensation for regulated carriers. The existing regime of
3 access charges and intercarrier compensation is rooted in pre-
4 divestiture and pre-Telecommunications Act regulatory schemes
5 that no longer further the policies of recent law or this
6 Commission. Reform of existing intercarrier compensation
7 methodologies will tremendously impact several vital policy
8 goals of this Commission. These include, without limitation,
9 the Commission's promotion of competitive markets, new
10 investments, fair rate structures, affordable universal service,
11 and service quality.

12
13 3. Certainly, intercarrier compensation influences
14 numerous aspects of regulated telecommunications. The questions
15 raised in the December 3, 2001, Procedural Order accurately
16 reflect the complexity of access charge reform and intercarrier
17 compensation and their correlation with other telecommunications
18 issues. For example, the Hearing Division seeks input on the
19 following issues that are raised by potential reform of
20 intercarrier compensation structures and mechanisms:
21

- 22
- 23 A. Should the Commission address both switched and
special access in an access charge reform proceeding.
 - 24 B. Whether switched access charges and the CCL element in
25 particular contain implicit subsidies.
- 26

- 1 C. What is the measure of cost for quantifying implicit
2 subsidies and for setting intrastate rates.
- 3 D. What is the extent that implicit subsidies exist in
4 access charges.
- 5 E. Should access charges be set at the same rates as
6 unbundled network elements for the same network
7 elements and functionality.
- 8 F. What are the dollar amounts paid and received for
9 switched access by rate element, by month, for the
10 period July 1, 2000 through June 30, 2001.
- 11 G. Are there differences in the costs of providing
12 interstate and intrastate switched access services.
- 13 H. What is the relationship among intrastate access
14 charge reform, the Arizona Universal Service Fund
15 mechanism, the FCC's intercarrier compensation docket,
16 and the FCC's CALLS Decision.
- 17 I. Should the Commission address CLEC and rural carrier
18 access charges as part of this Docket.
- 19 J. What is the effect of access charge reform on Qwest's
20 Price Cap Plan and on Qwest's Tariff Filing to
21 Introduce a New Rate Structure for an Access Service
22 in Docket No. T-01051B-01-0391.
- 23 4. In short, the issues and effects of access charge
24 reform and intercarrier compensation are very complex and
25 critically important for all members of the telecommunications
26 industry and consumers in Arizona. And, in order to provide the
analysis, planning, and detail requested in the Procedural
Order, the joint movants require additional time. The joint
movants suggest that additional time to study these matters will
result in more productive responses and data that the Commission

1 may utilize to reform access charges and establish an
2 intercarrier compensation regime that will impact
3 telecommunications for many years into the future. The joint
4 movants therefore believe that an additional forty-five days up
5 to and including March 8, 2002, are necessary to respond to the
6 December 3, 2001, Procedural Order. The movants also request
7 that the schedule for Staff's proposed recommendations, further
8 responsive comments from the parties, and the February 5, 2002,
9 procedural conference be adjusted and moved a commensurate
10 forty-five days.
11

12 5. The undersigned is authorized to sign and file this
13 joint motion on behalf of the named parties.
14

15 WHEREFORE, Qwest Corporation and AT&T Communications of the
16 Mountain States, Inc., respectfully and jointly move for an
17 order extending the time for an additional forty-five days up to
18 and including March 8, 2002, in which to provide written
19 comments in response to the December 3, 2001 Procedural Order,
20 and that the remaining proceedings in this docket be adjusted
21 and moved forty-five days into the future.
22

23 ///

24 ///

25 ///

26 ///

1 DATED this 28th day of December, 2001.

2 FENNEMORE CRAIG

3
4 By 

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12 OSBORN MALEDON, P.A.

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21 ORIGINAL +10 copies filed this
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20 Arizona Telephone Company
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23 Centruytel
24 PO Box 4065
25 Monroe, LA 71211-4065
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1	Citizens Utilities Rural Co.	Valley Telephone Cooperative
2	Citizens Communications Co. of	752 E. Malley Street
3	Arizona	PO Box 970
4	4 Triad Center, Suite 200	Willcox, AZ 85644
5	Salt Lake City, UT 84180	
6		
7	Copper Valley Telephone, Inc.	Verizon California Inc.
8	PO Box 970	One Verizon Way - CA500GCF
9	Willcox, AZ 85644	Thousand Oaks, CA 91362-3811
10		
11	Midvale Telephone Exchange	AT&T Communications of the
12	PO Box 7	Mountain States, Inc.
13	Midvale, ID 83645	111 W. Monroe, Ste. 1201
14		Phoenix, AZ 85003
15		
16	Navajo Communications Co., Inc.	Brooks Fiber Communications of
17	4 Triad Center, Suite 200	Tucson, Inc.
18	Salt Lake City, TU 84180	201 Spear Street, 9 th Floor
19		San Francisco, CA 94105
20		
21	Caprock Telecommunications Corp.	Citizens Long Distance Co.
22	15601 N. Dallas Parkway, S# 700	5600 Headquarters Drive
23	Dallas, TX 75248	Plano, TX 75024
24		
25	Citizens Telecommunications Co.	Max-Tel Communications, Inc.
26	of the White Mountains, Inc.	105 N. Wickham
27	4 Triad Center, Ste. 200	PO Box 280
28	Salt Lake City, UT 84180	Alvord, TX 76225
29		
30		
31	Comm South Companies, Inc.	MCI WorldCom Communications
32	2909 N. Buckner Blvd., Ste. 200	201 Spear Street, 9 th Floor
33	Dallas, TX 75228	San Francisco, CA 94105
34		
35	Covad Communications Co.	MCIMetro
36	4250 Burton Drive	201 Spear Street, 9 th Floor
37	Santa Clara, CA 95054	San Francisco, CA 94105
38		
39		

1	Cox Communications	Metropolitan Fiber Systems of
2	20401 N. 29 th Avenue	Arizona, Inc.
3	Phoenix, AZ 85027	201 Spear Street, 9 th Floor
4		San Francisco, CA 94105
5	Digital Services Corp.	Mountain Telecommunications
6	211 N. Union Street, Ste. 300	2540 E. 6 th Street
7	Alexandria, VA 22314	Tucson, AZ 85716
8		
9	E.Spire	North County Communications
10	131 National Business Parkway,	3802 Rosencrans, Ste. 485
11	Ste. 100	San Diego, CA 92110
12	Annapolis Junction, MD 20701	
13		
14	Electric Lightwave, Inc.	One Point Communications
15	4 Triad Center, Ste. 200	Two Conway Park
16	Salt Lake City, UT 84180	150 Field Drive, Ste. 300
17		Lake Forest, IL 60045
18		
19	Eschelon Telecom Arizona, Inc.	RCN Telecom Services, Inc.
20	730 Second Avenue South, S# 1200	105 Carnegie Center
21	Minneapolis, MN 55402	Princeton, NJ 08540
22		
23	Global Crossing Local Services	Reflex Communications, Inc.
24	180 South Clinton	83 South King Street, Ste. 106
25	Rochester, NY 14646	Seattle, WA 98104
26		
27		
28	Global Crossing Telemanagement	Rhythm Links, Inc.
29	180 South Clinton	9100 E. Mineral Circle
30	Rochester, NY 14646	Englewood, CO 80112
31		
32	Intermedia Communications, Inc.	Sprint Communications Company,
33	One Intermedia Way	6860 W. 115 th , MS:KSOPKD0105
34	Tampa, FL 33647-1752	Overland Park, KS 66211
35		
36		

1	Jato Operating Corporation	TCG Phoenix
2	6200 Syracuse Way, Ste. 200	111 West Monroe St., Ste. 1201
3	Englewood, CA 80111	Phoenix, AZ 85004
4	Level 3 Communications, LLC	The Phone Company/Network
5	1025 Eldorado Blvd.	Services of New Hope
6	Broomfield, CO 80021	6805 Route 202
7		New Hope, PA 18938
8	Verizon Select Services Inc.	IG2, Inc.
9	6665 MacArthur Blvd, HQK02D84	80-02 Kew Garden Road, S# 5000
10	Irving, TX 75039	Kew Gardens, NY 11415
11	Winstar Wireless of Arizona	Independent Network Services
12	1577 Spring Hill Road, 2 nd Fl.	Corp. (FN)
13	Vienna, VA 22182	2600 N. Central Avenue, S# 1750
14		Phoenix, AZ 85004
15	XO Arizona Inc.	360 Networks (USA) Inc.
16	3930 Watkins, Ste. 200	12101 Airport Way
17	Phoenix, AZ 85034	Broomfield, CO 80021
18	Main Street Telephone Company	Allcom USA
19	200 Ithan Creek Avenue	2151 E. Convention Ctr Way,
20	Villanova, PA 19085	Ste. 207-A
21		Ontario, CA 91764-4483
22	Alliance Group Services, Inc.	Net-Tel Corporation
23	1221 Post Road East	11921 Freedom Drive
24	Westport, CT 06880	Reston, VA 20190
25	American Telephone Network, Inc.	Nextlink Long Distance Svcs.
26	2313 6 th Avenue South	3930 E. Watkins, Ste. 200
	Birmingham, AL 35233	Phoenix, AZ 85034

1	Archtel, Inc. 1800 West Park Drive, Ste. 250 Westborough, MA 01581	GST Net, Inc. 4001 Main Street Vancouver, WA 98663
3		
4	One Point Communications Two Conway Park, #300 Lake Forest, IL 60045	Communique Telecommunications 4015 Guasti Road Ontario, CA 91761
6		
7	Opex Communications, Inc. 500 E. Higgins Rd., Ste. 200 Elk Grove Village, IL 60007	Enhanced Communications Network, Inc. 37 Winthrop Place Hazlet, NJ 07730
9		
10	Pac-West Telecomm, Inc. 1776 W. March Lane, #250 Stockton, CA 95207	Ernest Communications, Inc. 6475 Jimmy Carter Blvd., S# 300 Norcross, GA 30071
12		
13	RCN Telecom Services, Inc. 105 Carnegie Center Princeton, NJ 08540	Single Billing Services, Inc. 9550 Flair Drive, Ste. 409 El Monte, CA 91731
15		
16	Special Accounts Billing Group 1523 Withorn Lane Inverness, IL 60067	Joan S. Burke Osborne Maledon 2929 N. Central Ave., 21 st Fl. Phoenix, AZ 85067
18		
19	Teligent Services, Inc. 8065 Leesburg Pike, Ste. 400 Vienna VA 22182	Michael Patten Roshka, Heyman & DeWulf Two Arizona Center 400 Fifth Street, S# 100 Phoenix, AZ 85004
21		
22		
23	Tess Communications, Inc 12050 Pecos Street, Ste. 300 Westminster, CO 80234	Touch America 130 N. Main Street Butte, MT 59701
24		
25		
26		

1 VYVX, LLC
2 One Williams Center, MD 29-1
3 Tulsa, OK 74172

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3650 131st Avenue SE, Ste. 400
Bellevue, WA 98006

4 Williams Local Network, Inc.
5 One Williams Center, MD 29-1
6 Tulsa, OK 74172

Main Street Telephone Company
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Villanova, PA 19085

7 North County Communications Corp
8 3802 Rosencrans, #485
9 San Diego, CA 92110

10 Nancy Rinder

11 PHX/DRENFRO/1256569
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